

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MWF)

(Jointly Administered)

**ORDER GRANTING DEBTORS' MOTION FOR LEAVE TO FILE DEBTORS' (A)
BIDDING PROCEDURES MOTION REPLY AND (B) ESTIMATION MOTION REPLY**

Upon the motion, dated July 24, 2023 (the “**Motion for Leave**”)² of the Debtors for entry of an order (this “**Order**”) pursuant to Local Rule 9006-1(d) authorizing the Debtors to file the Replies; and the Court having found that it has jurisdiction to consider the Motion for Leave and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference*, dated February 29, 2012 (Sleet, C.J.); and consideration of the Motion for Leave and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due, sufficient, and proper notice of the Motion for Leave having been provided under the circumstances and in accordance with the Bankruptcy Rules and the Local Rules, and it appearing that no other or further notice need be provided; and a hearing having been held, if necessary, to consider the relief requested in the Motion for Leave (the “**Hearing**”); and upon the record of the Hearing, if any, and all of the proceedings had before the Court; and the Court having found and

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

² Capitalized terms used, but not otherwise defined, herein shall have the meanings ascribed to them in the Motion for Leave.

determined that the relief sought in the Motion for Leave is in the best interest of the Debtors, their estates, their creditors, their stakeholders, and all other parties-in-interest; and after due deliberation thereon; and this Court having determined that there is sufficient cause appearing for the relief granted in this Order,

IT IS HEREBY ORDERED THAT:

1. The Motion for Leave is GRANTED as set forth herein.
2. The Debtors are granted leave and permission to file the Replies, and the Court will consider the Replies.
3. The Debtors are authorized to take all reasonable actions necessary or appropriate to effectuate the relief granted in this Order.
4. This Court retains jurisdiction with respect to all matters arising from or related to the enforcement of this Order.